

KAZEROUNI LAW GROUP, APC
NEVADA, CALIFORNIA

Michael Kind, Esq.
NV Bar No. 13903
KAZEROUNI LAW GROUP, APC
7854 W. Sahara Avenue
Las Vegas, NV 89117
Phone: (800) 400-6808 x7
FAX: (800) 520-5523
mkind@kazlg.com

David H. Krieger, Esq.
NV Bar No. 9086
HAINES & KRIEGER, LLC
8985 S. Eastern Avenue, Suite 350
Henderson, Nevada 89123
Phone: (702) 880-5554
FAX: (702) 385-5518
dkrieger@hainesandkrieger.com

Attorneys for Plaintiff, Patricia E. Nave

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

<p>PATRICIA E. NAVE,</p> <p>Plaintiff,</p> <p>v.</p> <p>CAPITAL ONE, CHASE, CITIFINANTIAL AUTO, OCWEN LOAN SERVICING, LLC, EQUIFAX INFORMATION SERVICES, LLC and SELECT PORTFOLIO SERVICING, INC.,</p> <p>Defendants.</p>	<p>Case No: 2:15-cv-02275-JCM-PAL</p> <p>STIPULATION AND ORDER FOR AN EXTENSION OF TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT'S MOTION TO DISMISS [First Request]</p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

STIPULATION AND PROPOSED ORDER

Plaintiff Patricia E. Nave (“Plaintiff”), Defendant Select Portfolio Servicing, Inc. (“SPS”) (jointly as the “Parties”), by and through their respective counsel, hereby submit this stipulation for an extension of time for Plaintiff to respond to SPS’ motion to dismiss [ECF No. 20].

WHEREAS, on August 5, 2015, Plaintiff filed in the Eighth Judicial District Court, District of Nevada a Complaint for Damages, ECF No. 1-1;

WHEREAS, on December 2, 2015, this case was removed to this Court, ECF No. 1;

WHEREAS, on January 4, 2016, SPS filed its Joinder to Capital One Bank (USA), N.A.’s Motion to Dismiss the Complaint, ECF No. 20;

WHEREAS, a Response to SPS’ Motion to Dismiss is due on January 21, 2016, ECF No. 20;

WHEREAS, the Parties are discussing the possible early resolution of the dispute between the Parties;

WHEREAS, this is the first request for an extension of this deadline by the Parties.

NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties as follows:

- (1) The January 21, 2016 date to Respond to SPS’ Motion to Dismiss [ECF No. 20] is vacated;

///

///

///

///

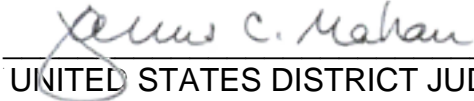
///

///

(2) Plaintiff shall have until February 11, 2016 to respond to SPS' Motion to Dismiss [ECF No. 20].

DATED this 21st day of January 2016.

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: January 22, 2016

KAZEROUNI LAW GROUP, APC

By: /s/ Michael Kind
Michael Kind, Esq.
7854 W. Sahara Avenue
Las Vegas, NV 89117
Attorneys for Plaintiff

WRIGHT, FINLAY & ZAK, LLP

By: /S/ Chelsea Crowton
Chelsea Crowton, Esq.
7785 W. Sahara Ave., Suite 200
Las Vegas, NV 89117
702-475-7964
Email: ccrowton@wrightlegal.net
Attorneys for Select Portfolio Servicing, Inc.

KAZEROUNI LAW GROUP, APC
NEVADA, CALIFORNIA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on January 21, 2016, the foregoing STIPULATION AND PROPOSED ORDER FOR AN EXTENSION OF TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT'S MOTION TO DISMISS [First Request] was served via CM/ECF to all parties appearing in this case.

KAZEROUNI LAW GROUP, APC

By: /s/ Michael Kind
Michael Kind
7854 W. Sahara Avenue
Las Vegas, NV 89117

KAZEROUNI LAW GROUP, APC
NEVADA, CALIFORNIA